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February 19, 2004

VIA E-MAIL and HAND-DELIVERY

David S. Rosenzweig, Esq.
Keegan, Werlin & Pabian, LLP
265 Franklin Street, Sixth Floor
Boston, MA 02110

RE: NSTAR Electric, D.T.E. 03-121

Dear Mr. Rosenzweig:

Enclosed please find the Members of the NE DG Coalition's first set of information requests in the above-captioned matter. Responses should be filed on or before March 4, 2004. If you have any questions, please contact me.

Sincerely,

Robert M. Granger

RMG:nbc
Enclosures

cc: Mary Cottrell (by hand)
William Stevens (by hand)
John Cope-Flanagan (by hand)
Sean Hanley (by hand)
Claude Francisco (by hand)
Xuan Yu (by hand)
Robert Harrold (by hand)
Service List (by mail)

**COMMONWEALTH OF MASSACHUSETTS
DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY**

**FIRST SET OF INFORMATION REQUESTS OF
THE MEMBERS OF THE NE DG COALITION TO
NSTAR ELECTRIC, D.T.E. 03-121**

Pursuant to 220 C.M.R. 1.06(6)(c), the Members of the NE DG Coalition ("NE DG Coalition") hereby submit to Boston Edison Company, Cambridge Electric Light Company and Commonwealth Electric Company the following information requests with respect to the above captioned matter.

Instructions

The following instructions apply to this set of information requests and all subsequent information requests issued by the NE DG Coalition to Boston Edison Company, Cambridge Electric Light Company and Commonwealth Electric Company in this proceeding.

1. "NSTAR Electric" or "Companies" means Boston Edison Company, Cambridge Electric Light Company and Commonwealth Electric Company, their officers, directors, employees, consultants, and attorneys.
2. "Company" means each of Boston Edison Company, Cambridge Electric Light Company and Commonwealth Electric Company and their respective officers, directors, employees, consultants and attorneys. Where a request is directed to "the Company" or "each of the Companies" provide a separate response for each Company.
3. "Department" means the Department of Telecommunications and Energy.
4. "Proposed Rates" means the rates proposed by the Companies in this proceeding: Boston Edison Company, Rates SB-1 and SB-2; Cambridge Electric Light Company, Rates SB-1, MS-1, SS-1, SB-2 and SB-3; and Commonwealth Electric Company, Rates SB-1 and SB-2.
5. "Applicable Rate Schedule" means the Applicable Rate Schedule referred to in each of the Proposed Rates.
6. "Distributed Generation" or "DG" has the meaning ascribed to it in G.L. c. 164, §1.
7. "Last General Rate Case" means, for each Applicable Rate Schedule, the last Department proceeding in which the Company submitted a cost of service study in support of the Applicable Rate Schedule.
8. "Companies' Filing" or "Filing" means all the documents NSTAR Electric filed in this

proceeding.

9. Each request should be answered in writing on a separate page with a recitation of the request, and with a reference to the request number, the docket number of the case, and the name of the person responsible for the answer. Please submit all responses on three-hole punched paper.
10. Please do not wait for all answers to be completed before supplying answers, but instead please provide the answers as they are completed.
11. These requests shall be deemed continuing so as to require further supplemental responses if the Company or its witnesses receives or generates additional information within the scope of these requests between the time of the original response and the close of the record in this proceeding.
12. The phrase "provide complete and detailed documentation" means provide all data, assumptions, and calculations on which the response relies; provide the source of and basis for all data and assumptions employed; include all studies, reports, and planning documents from which data, estimates, or assumptions were drawn and support for how the data or assumptions were used in developing the projections or estimates; and provide and explain all supporting workpapers.
13. The term "document" is used in its broadest sense and includes, without limitation, writings, drawings, graphs, charts, photographs, phono-records, microfilm, microfiche, computer printouts, correspondence, handwritten notes, records or reports, bills, checks, articles from journals or other sources, and other data compilations from which information can be obtained, and all copies of such documents that bear notations or other markings that differentiate such copies from the original.
14. If the Company finds that any of these requests is ambiguous, please notify the NE DG Coalition counsel so that the requests can be clarified prior to the preparation of a written response.

**COMMONWEALTH OF MASSACHUSETTS
DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY**

**FIRST SET OF INFORMATION REQUESTS OF
THE MEMBERS OF THE NE DG COALITION TO
NSTAR ELECTRIC, D.T.E. 03-121**

Pursuant to 220 C.M.R. § 1.06(6)(c), the Members of the NE DG Coalition ("NE DG Coalition") hereby submit to NSTAR Electric the following information requests.

NEDGC 1-1 Provide, for each Company, the most recent annual report filed with the Department.

NEDGC 1-2 Provide, for each Applicable Rate Schedule:

- (a) all Department orders approving or relating to the Applicable Rate Schedule, dating back to and including the Last General Rate Case;
- (b) the cost of service study submitted by the Company in support of the Applicable Rate Schedule in the Company's Last General Rate Case.
- (c) all direct and cross examination testimony and all exhibits relating to the Applicable Rate Schedule submitted to the Department by the Company, dating back to and including the Last General Rate Case; and
- (d) all compliance filings relating to the Applicable Rate Schedule submitted to the Department by the Company, dating back to and including the Last General Rate Case.

NEDGC 1-3 Provide the monthly non-coincident and coincident peak demand for Boston Edison's proposed rate classes SB-1 and SB-2 for the years 1998 through 2003.

NEDGC 1-4 Provide the monthly non-coincident and coincident peak demand for Cambridge Electric Light Company's proposed rate classes SB-1, MS-1, SS-1, SB-2 and SB-3 for the years 1998 through 2003.

NEDGC 1-5 Provide the monthly non-coincident and coincident peak demand for Commonwealth Electric Company's proposed rate classes SB-1 and SB-2 for the years 1998 through 2003.

NEDGC 1-6 Except to the extent provided in response to Information Request DTE-09, provide the monthly non-coincident and coincident peak demand for each Applicable Rate Schedule class for the years 1998 through 2003.

NEDGC 1-7 Provide, for each Company, a list of all customers with a DG facility. Provide for each customer listed the following:

- (a) the installed capacity of the DG facility;
- (b) whether the DG facility is a Qualifying Facility under the Department's regulations;
- (c) whether the DG facility is an On-Site Generating Facility under the Department's regulations;
- (d) the year the DG facility was installed;
- (e) whether the customer was an all-requirements customer prior to the installation of the DG Facility;
- (f) the customer's estimated internal electric load requirements;
- (g) the rate schedules under which the customer currently takes service.

NEDGC 1-8 For each customer listed in response to NEDGC-7, provide the monthly coincident peak demand, if known, the monthly metered maximum demand, and the monthly metered kilowatt hour consumption for the years 1998-2003.

NEDGC 1-9 For each customer listed in response to NEDGC-7, provide the following:

- (a) the amount the customer paid the Company for electric service for the years 1998-2003;
- (b) the Proposed Rate(s) that would apply to the customer if approved by the Department;
- (c) the amount the customer would have paid the Company for electric service under the Proposed Rate(s) for the years 1998 through 2003.

NEDGC 1-10 Provide, for each Company, the dollar balance for each distribution plant account, account nos. 360-373, for each of the years 1993-2003. For each account balance and year, provide the following:

- (a) the amount related to substation plant;
- (b) the amount related to primary distribution plant;

- (c) the amount related to secondary distribution plant;
- (d) the amount related to services and meters.

If records are not available for any of the above amounts, provide the Company's best estimate and identify the amount as estimated.

NEDGC 1-11 Provide, for each Company, the dollar amount of new investment for each distribution plant account, account nos. 360-373, for each of the years 1993-2003. For each account and year, provide the following:

- (a) the amount related to substation plant;
- (b) the amount related to primary distribution plant;
- (c) the amount related to secondary distribution plant;
- (d) the amount related to services and meters.

If records are not available for any of the above amounts, provide the Company's best estimate and identify the amount as estimated.

NEDGC 1-12 Provide, for each Company, the dollar amount for each distribution operation and maintenance account, account nos. 580-598, for each of the years 1993-2003. For each account and year, provide the following:

- (a) the amount related to substation plant;
- (b) the amount related to primary distribution plant;
- (c) the amount related to secondary distribution plant;
- (d) the amount related to services and meters.

If records are not available for any of the above amounts, provide the Company's best estimate and identify the amount as estimated.

NEDGC 1-13 Provide, for each Company, for each of the years 1993-2003, the annual coincident peak demand; the sum of the non-coincident annual class peak demands; the sum of the individual customers' annual maximum demands; and the number of customers at the following voltage levels:

- (a) substation;

- (b) primary voltage;
- (c) secondary voltage.

NEDGC 1-14 Provide all studies, analyses, reports, internal memoranda, data and other documents in the Companies' possession which relate to any of the following, whether or not they are favorable to the Company's position in this proceeding:

- (a) the cost of providing standby service to DG customers in the Companies' service territories;
- (b) the standby load of DG customers in the Companies' service territories;
- (c) the benefits of DG customers to the Companies' distribution systems including "the potential to relieve transmission and distribution constraints and protect against outages", *Direct Testimony of Henry C. LaMontagne at 8*;
- (d) the reliability of DG facilities;
- (e) the penetration of DG facilities in the Companies' service territories.

NEDGC 1-15 Provide complete and detailed documentation supporting the statement in the Direct Testimony of Henry C. LaMontagne ("LaMontagne Testimony") at p. 16, lines 7-9, that "standby customers cause costs to be incurred by the Company in the same manner as comparable non-standby customer."

NEDGC 1-16 Provide complete and detailed documentation for the Companies' belief "that non-firm service would require the customer to request standby delivery service when its generation facilities are unavailable." *LaMontagne Testimony at p. 27, lines 8-10*. Identify all other customer classes for which the Companies require the customer to request delivery service in advance.

NEDGC 1-17 Provide complete and detailed documentation for the statement that "the Company also adds distribution system capacity to serve its standby customers on a kW-for-kW basis." *LaMontagne Testimony at p. 30, lines 6-7*.

NEDGC 1-18 Provide complete and detailed documentation for the statement that "the Company's rate design supports cost-effective DG." *LaMontagne Testimony at p. 31, line 6*.

**COMMONWEALTH OF MASSACHUSETTS
DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY**

CERTIFICATE OF SERVICE

DTE 03-121

I hereby certify that I have this day served the foregoing First Set of Information Requests of the Members of the NEDG Coalition upon all parties of record in this proceeding in accordance with the requirements of 220 CMR 1.05(1) (Department's Rules of Practice and Procedure.)

Dated at Boston this 19th day of February, 2004.

Robert M. Granger

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